

# **EXHIBIT 25**

CHIA SIU

June 12, 2012

<p>1 C. SIU  2 internship at UBS.  3 Q. While you were in school?  4 A. Yeah.  5 Q. And then did you also do some  6 bartending?  7 A. Yes, yeah, like on the side, in  8 addition to my payroll job and the UBS, if I  9 have free time, because I needed the money,  10 like, you know.  11 Q. So the first job after you  12 graduated from college was the internship?  13 A. Yeah, the one-year rotational  14 internship.  15 Q. When you were hired full-time by  16 Citi, do you recall when that was?  17 A. Oh, when they gave me an offer?  18 It was around beginning of 2006.  19 Q. And do you know when you began  20 your employment with Citi?  21 A. As an analyst or intern?  22 Q. After the internship.  23 A. Okay. I think it was around July  24 2005 -- '06, after the end of my internship.  25 Q. And I think you mentioned as an</p>	57	<p>1 C. SIU  2 something but I really want to join Citi and  3 if -- and see if they could do anything. And  4 they were able to get me offer to join as an  5 analyst, so that I wouldn't have to wait or --  6 yeah.  7 Q. So who did you talk to about the  8 offer?  9 A. I talked to Ping Hsieh who is a VP  10 at the time of termination in the housing  11 group.  12 Q. Ping was a vice president at the  13 time that she was terminated?  14 A. Yes.  15 Q. When was she terminated?  16 A. At the same time.  17 Q. At the same time as you?  18 A. Yes, like November.  19 Q. Of 2008?  20 A. Yes.  21 Q. Other than speaking with Ping  22 about getting an offer as an analyst, did you  23 talk to anyone else at Citigroup?  24 A. Well, she was the point person  25 because she was the one who I interviewed with</p>	59
<p>1 C. SIU  2 analyst. Is that the position you joined  3 CitiGroup as?  4 A. As a full time, yes.  5 Q. And were you assigned to a  6 particular group?  7 A. Yes. I joined -- I rejoined the  8 housing group.  9 Q. And how did that job offer come  10 about: did you interview with people?  11 MR. DATOO: Objection.  12 You can answer.  13 A. The position for the analyst, how  14 did it come about?  15 Well, I worked there for like, I  16 interned there for about six months, and at  17 that time, at the end of my internship, at my  18 time at Citi in December, there was a hiring  19 freeze, so at the beginning of 2006, like I  20 look for a job because since there was a  21 hiring freeze at Citi, I wasn't sure if the  22 hiring freeze would go away.  23 So I looked for a job, like other  24 positions, and I was able to find something  25 comparable, so I told them that like, I found</p>	58	<p>1 C. SIU  2 for the intern position. So she was, like to  3 me, she was in charge of like the hiring for  4 the group.  5 Q. Do you know whether, do you know  6 who approved your hiring into the group?  7 A. I'm not sure, but I would assume  8 like maybe the head of the housing group would  9 have something to do with it or maybe Marty  10 since he is the head of analyst associates.  11 Q. But you don't know one way or the  12 other?  13 A. Yeah, I don't really know.  14 Q. Do you know whether David  15 Brownstein was involved in approving your  16 hiring?  17 A. No, I didn't know David at that  18 time.  19 Q. So you don't know one way or the  20 other whether he was involved?  21 A. No.  22 Q. How about Frank Chin, do you know  23 whether he was involved in approving your  24 hiring?  25 A. I don't know. I don't know.</p>	60



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<p>1 C. SIU</p> <p>2 Q. January of 2008?</p> <p>3 A. Yeah, if that was when the first</p> <p>4 layoff occurred.</p> <p>5 Q. Do you know where she went?</p> <p>6 A. I forgot the name of the firm.</p> <p>7 Q. And Michael Murad, he was hired as</p> <p>8 an analyst?</p> <p>9 A. He was hired as an associate.</p> <p>10 Q. In 2008 you said, right?</p> <p>11 A. Yes.</p> <p>12 Q. At any time while Nick Fluehr was</p> <p>13 the head of the housing group while you were</p> <p>14 there, did he have a co-head?</p> <p>15 A. When I was there? No. Like, when</p> <p>16 I joined it was just him.</p> <p>17 Q. And at some point in 2008 Nick</p> <p>18 Fluehr was terminated. Is that right?</p> <p>19 A. Yeah, it was the layoff before</p> <p>20 mine which happened end of June I believe.</p> <p>21 Q. So he was part of a reduction in</p> <p>22 force?</p> <p>23 A. Yes, like the layoff.</p> <p>24 Q. And when I say reduction in force,</p> <p>25 do you know what I mean by that?</p>	69	<p>1 C. SIU</p> <p>2 about 20 years, and then one day the company</p> <p>3 would just tell him that he no longer needs to</p> <p>4 come in. Like, I was just like really shocked</p> <p>5 that they will let the head of the group go</p> <p>6 when he was so committed and loyal to the</p> <p>7 company for almost, like, for about two</p> <p>8 decades, like, and we didn't have, like -- you</p> <p>9 know, he was our leader, like.</p> <p>10 Q. Why do you believe he was</p> <p>11 terminated?</p> <p>12 A. I don't know. Like, it's because</p> <p>13 maybe he -- like for cost savings. I don't</p> <p>14 know, I wasn't part of the discussion.</p> <p>15 Q. Did you talk to anyone about his</p> <p>16 termination?</p> <p>17 A. Yeah, like the people in my group,</p> <p>18 given, everyone was really shocked, like, we</p> <p>19 were shocked for a while.</p> <p>20 Q. Did anyone tell you why he was</p> <p>21 terminated?</p> <p>22 A. I think mainly because of his</p> <p>23 position, his, given that he was the head of</p> <p>24 the group, like he was costly, I guess, I</p> <p>25 think for cost-saving purpose.</p>	71
<p>1 C. SIU</p> <p>2 A. Regarding the June layoff, like?</p> <p>3 Q. Or any of the layoffs. A</p> <p>4 reduction in force, when I say that, I mean a</p> <p>5 group of people were let go --</p> <p>6 A. Yes.</p> <p>7 Q. -- not just one individual.</p> <p>8 A. Yes, he was part of -- one of a</p> <p>9 few people.</p> <p>10 Q. So he was let go in June of 2008?</p> <p>11 A. Yeah, like end of June.</p> <p>12 Q. Was anyone else from the housing</p> <p>13 group let go at that time?</p> <p>14 A. Henry Chen.</p> <p>15 Q. So one of the other analysts?</p> <p>16 A. Yeah, he have like a year of</p> <p>17 experience by then, I think.</p> <p>18 Q. Were you surprised by Mr. Fluehr's</p> <p>19 termination?</p> <p>20 A. Yeah, I was pretty shocked since</p> <p>21 like he is the head of our group, he leads, he</p> <p>22 led the group. So I was pretty devastated</p> <p>23 that he was let go considering how long he had</p> <p>24 been working with the company.</p> <p>25 He worked there, I believe for</p>	70	<p>1 C. SIU</p> <p>2 Q. And who told you that?</p> <p>3 A. It might have been management,</p> <p>4 maybe Brownstein. I forget whether it was</p> <p>5 Brownstein or like the people in my group who</p> <p>6 have knowledge of the termination.</p> <p>7 Q. Do you think he was terminated</p> <p>8 because of his gender?</p> <p>9 A. No.</p> <p>10 Q. Do you think someone else should</p> <p>11 have been terminated in his stead?</p> <p>12 A. Instead of him?</p> <p>13 Well, I don't think anyone should</p> <p>14 be terminated.</p> <p>15 Q. Even if --</p> <p>16 A. Because we were already</p> <p>17 short-staffed.</p> <p>18 Q. So even if the company needs to</p> <p>19 save costs, you don't think anyone should be</p> <p>20 terminated?</p> <p>21 A. Yeah, well, maybe like people in</p> <p>22 the other groups, because from what I heard</p> <p>23 our group was doing pretty well, when I talked</p> <p>24 to Marty Feinstein.</p> <p>25 Q. Do you know whether people from</p>	72



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<p>1 C. SIU  2 other groups were terminated in June of 2008?  3 A. Yeah, other people. It was a mass  4 layoff.  5 Q. And do you know whether people  6 from all groups were terminated in June of  7 2008?  8 A. You mean a person from each group  9 was terminated?  10 Q. Yes.  11 A. I wasn't sure. I was just  12 concerned about my own group.  13 Q. And --  14 A. Because it didn't make sense  15 because we were already short-staffed and our  16 group was doing well, like it didn't make  17 sense for them to cut people from our group  18 when we were already short-staffed and we lost  19 two people earlier, in the beginning, in the  20 beginning of 2008.  21 Q. That was Amy Wang?  22 A. Yes.  23 Q. And who else?  24 A. The other VP.  25 Q. Oh, the vice president?</p>	<p>73 C. SIU  2 they let someone else go, like in June, like  3 Henry Chen.  4 Q. I'm sorry, you said it was --  5 A. Henry Chen was let go.  6 Q. No, the person who was hired,  7 Tian?  8 A. Yeah, Y-A-N-G.  9 Q. And was he part of the analyst  10 program at Citigroup?  11 A. Yes, like, so he had to go through  12 training and he didn't join the group until  13 like probably like two months after training.  14 He didn't have that much experience.  15 It didn't make sense for them to  16 hire him when Henry Chen has been with the  17 firm for a year, like. I was confused.  18 Q. Do you know when Mr. Yang got his  19 employment offer from CitiGroup?  20 A. When he joined or when he got that  21 employment?  22 Q. When he got the offer.  23 A. I'm not sure. I'm not, like,  24 responsible for that.  25 Q. How long had you worked with Mr.</p>
<p>1 C. SIU  2 A. Yeah, he was only there for, like  3 a few months, like two, three, months, maybe.  4 Yeah, because our group was like  5 short-staffed. And we were doing well. It  6 didn't make sense for them to cut anyone from  7 my group. So we were just shocked that Nick  8 was let go and Henry Chen as well.  9 Q. After Henry Chen left, were you  10 the only analyst remaining in the group?  11 A. Right after the layoff, like the  12 June, immediately? Yeah, because I think it  13 was just me and Raymond High left, in terms of  14 junior resources, staff.  15 Q. And Raymond High was an associate?  16 A. Yeah, but -- title-wise, yes.  17 Q. And Michael Murad was an associate  18 also?  19 A. Yeah, I'm not sure when he joined.  20 He might have joined July. I'm not sure, but  21 he needed training and stuff.  22 Q. Did any analyst join after June of  23 2008?  24 A. Yes. Tian Yang, which didn't make  25 sense. Like if we needed someone, why did</p>	<p>74 C. SIU  2 Fluehr?  3 A. Since, I guess since I started out  4 as an intern because that's the group that I  5 joined and they requested me back after the  6 internship.  7 Q. Did you consider Mr. Fluehr a  8 mentor?  9 A. I view him as the leader of the  10 group, yes.  11 Q. Did you consider him a friend?  12 A. No, like he's a professional --  13 he's my boss like.  14 Q. So you didn't have a social  15 relationship with him, as friends you wouldn't  16 go out socially?  17 A. No.  18 Q. You mentioned that Mr. Koessel  19 said to you you were performing at a high  20 level?  21 A. Yeah, like --  22 Q. When did he say that?  23 A. I think it was like around 2008  24 that I was already -- even though my title  25 wasn't analyst, like I was performing, he told</p>

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<p>1 C. SIU  2 me that I was already performing the associate  3 level work, like, you know.  4 Q. Do you know when Raymond High was  5 hired by Citi?  6 A. As a full-time analyst?  7 Q. Just, do you know when he was  8 hired?  9 A. As an analyst or an intern?  10 Because I think he did like a summer  11 internship at Citi.  12 Q. And then when do you think he was  13 hired full time?  14 A. In 2004 I believe.  15 Q. And do you know when he was, when  16 he became an associate?  17 A. Maybe it was the year prior, '07,  18 maybe. Yeah, probably around 2007. Around  19 2007, around, yeah.  20 MR. TURNBULL: Why don't we take a  21 break. The tape is just about over.  22 Why don't we take a five or ten-minute  23 break.  24 THE WITNESS: Okay.  25 THE VIDEOGRAPHER: The time now is</p>	<p>77  1 C. SIU  2 of 2008, correct?  3 A. Yeah, like towards the end, yeah,  4 of November.  5 Q. And Mr. Fluehr was laid off in --  6 A. June.  7 Q. -- June of 2008. Were there  8 layoffs or reductions in force before June of  9 2008?  10 A. Yeah, I think the one before that  11 was around June -- January, I think.  12 Q. Do you recall how many rounds of  13 layoffs there were in 2008?  14 A. During my time there, I think  15 there were about three layoffs that affected  16 my group.  17 Q. Were you aware that there were  18 going to be layoffs before they occurred?  19 A. Yes. There was like rumors  20 floating around.  21 Q. And what were the rumors based on?  22 A. People would speculate when it  23 would occur, like around when.  24 Q. Was Citigroup having financial  25 trouble in 2008?</p>
<p>1 C. SIU  2 10:59 a.m. This marks the end of tape  3 No. 1. We're going off the record.  4 (Recess taken.)  5 THE VIDEOGRAPHER: The time now is  6 11:16 a.m. This marks the beginning of  7 tape No. 2. We're back on the record.  8 BY MR. TURNBULL:  9 Q. Ms. Siu, within the housing group,  10 were there individuals that you worked with  11 more frequently than others?  12 A. I worked frequently -- pretty  13 frequently with Amy and Ping and Koessel as  14 well. It is like a balance thing, because we  15 were short-staffed.  16 Q. And when Nick was there, did you  17 work with Nick a lot?  18 A. Not directly. It was more  19 indirectly because he delegated to either Mike  20 Koessel or Amy or Ping and then.  21 Q. I want to ask you some questions  22 about the reductions in force, and then the  23 layoffs, the different rounds of layoffs that  24 you've mentioned.  25 So you were laid off in November</p>	<p>78  1 C. SIU  2 A. Yes.  3 Q. Was the --  4 A. I think, yeah.  5 Q. Were you finished?  6 A. Yes.  7 Q. Was the financial market generally  8 having a tough time in 2008?  9 A. Yes, generally.  10 Q. Do you recall someone named  11 Parimal being laid off?  12 MR. DATOO: Is that a first name  13 or a last name?  14 MR. TURNBULL: First name.  15 A. It sounded like the VP that was  16 let go in January. I don't -- I think that's  17 his name.  18 Q. Let me just show you a document  19 just to see if we can refresh your memory.  20 MR. TURNBULL: I will ask the  21 court reporter to mark as Siu Exhibit 3,  22 an e-mail exchange between you and Henry  23 Chen on March 18th, 2008.  24 (Siu Exhibit 3, e-mail  25 exchange between Chia Siu and Henry</p>

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<p>1 C. SIU  2 Chen on March 18th, 2008 marked for  3 identification, as of this date.)  4 Q. Ms. Siu, you have been handed  5 Exhibit 3. If you would review that. Let me  6 know if you recognize it.  7 A. Yes, it seems familiar. Yes, I  8 think that's his name, yeah.  9 Q. So do you see in the second e-mail  10 from the top, it's from Henry Chen to you on  11 March 18th at 10:46 a.m.?  12 A. Yes.  13 Q. Henry Chen you mentioned earlier.  14 He was another analyst, is that right?  15 A. Yes.  16 Q. Was he in the same class as you?  17 A. No.  18 Q. What class was he in?  19 A. I believe he joined the firm in  20 2007 as an analyst.  21 Q. So you think he joined one year  22 after you?  23 A. Yeah, after I joined as an  24 analyst.  25 Q. And in this e-mail he says</p>	<p>81  1 C. SIU  2 Q. So let me just ask you to follow  3 up on that.  4 There was a round of layoffs in  5 January of 2008, is that your memory?  6 A. I think it was around beginning of  7 that year. If it wasn't January, then maybe  8 it was March according to this.  9 Q. And do you recall whether there  10 was a separate round of layoffs in March of  11 2008?  12 A. I didn't remember. I just  13 remember it was like beginning of the year,  14 since it is like four years ago, like.  15 Q. Do you know whether there were  16 layoffs in December of 2007?  17 A. I don't recall. I only know when  18 it happened to my group. We were already  19 short-staffed. I was just busy with my work.  20 Q. Do you know why Parimal was let  21 go?  22 A. He was let go I think probably due  23 to performance.  24 Q. And why do you think that?  25 A. He joined as a VP and as a VP you</p>
<p>1 C. SIU  2 "Parimal's been let go."  3 A. Um-hum.  4 Q. Was Parimal in your group?  5 A. Yes, I think that's his name. I  6 can't recall because he was there for so  7 short.  8 Q. Do you think this was the vice  9 president that --  10 A. Yes, I think so.  11 MR. DATOO: Chia, let him finish  12 asking the question.  13 THE WITNESS: I'm sorry.  14 Q. And do you see your response up  15 above, the top e-mail: "No, probably got  16 distracted with cash flows. Wow, sooner than  17 expected."  18 Do you see that?  19 A. Yes.  20 Q. What did you mean when you wrote  21 "sooner than expected"?"  22 A. I guess like a round that occurred  23 sooner than I thought, like another round,  24 maybe. I don't remember if he was part of a  25 mass layoff or those minor layoffs.</p>	<p>82  1 C. SIU  2 have certain expectations, and to me I felt  3 like he wasn't even performing at an analyst  4 level.  5 Q. Did you talk to anyone about why  6 Parimal was let go?  7 A. Not really. I thought it was  8 pretty clear, like, you know, his performance,  9 and he was relatively new to the group.  10 Q. Were you concerned about your job  11 in 2008?  12 A. Yeah, it was a huge concern,  13 especially after Nick was let go, because I  14 was concerned about whether management wanted  15 to keep the group.  16 Q. Were you concerned that you might  17 be fired as part of a round of layoffs?  18 A. Yeah, if they let the group go,  19 like we were all concerned about our job.  20 Q. Did you talk to anybody about your  21 concerns?  22 A. Yes, after the June layoff, I  23 talked to -- like, I think it was around end  24 of July, like I talked to Ping.  25 Q. Okay. And before we get to that,</p>

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<p>1 C. SIU</p> <p>2 I want to ask you, before the July, the June</p> <p>3 layoffs, the June 2008 layoffs, you were</p> <p>4 looking for other jobs in the market, correct?</p> <p>5 A. I wasn't actively looking. I was</p> <p>6 just looking to see what's out there. I</p> <p>7 didn't apply for anything in particular.</p> <p>8 Q. Did you have your resume posted</p> <p>9 online?</p> <p>10 A. It was posted -- it's always been</p> <p>11 up.</p> <p>12 Q. Where has it been up?</p> <p>13 A. Like job force, probably like</p> <p>14 Monster or those common job sites.</p> <p>15 Q. And other than having it posted on</p> <p>16 those job sites -- let me back up a second.</p> <p>17 When did you first post your</p> <p>18 resume on those job sites?</p> <p>19 A. Maybe it was like after college</p> <p>20 when I was looking for a job or like during</p> <p>21 college to look for a full-time job. Like a</p> <p>22 while ago.</p> <p>23 Q. Do you recall updating your resume</p> <p>24 in 2008 that was posted on the Internet?</p> <p>25 A. I don't remember. It's been such</p>	85	<p>1 C. SIU</p> <p>2 A. At that time?</p> <p>3 Q. Yes.</p> <p>4 A. I think at that time he was at UBS</p> <p>5 I think.</p> <p>6 Q. And he was a friend of yours?</p> <p>7 A. Yes.</p> <p>8 Q. And in his e-mail to you on</p> <p>9 January 15th, he says: "This might be</p> <p>10 somewhat helpful for your job hunting."</p> <p>11 Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Does that refresh your memory that</p> <p>14 you were job hunting in 2008?</p> <p>15 A. I was just curious to see what was</p> <p>16 out there. Like, I wasn't applying for</p> <p>17 anything. Because I might have mentioned that</p> <p>18 there were a few more rounds coming up.</p> <p>19 Q. And prior to the June layoffs, is</p> <p>20 it your testimony you weren't applying for any</p> <p>21 jobs with other employers?</p> <p>22 A. I don't remember applying for a</p> <p>23 particular position, yes.</p> <p>24 Q. Do you see your response to Jason?</p> <p>25 A. Yes.</p>	87
<p>1 C. SIU</p> <p>2 a long time ago.</p> <p>3 Q. Is it possible that you updated it</p> <p>4 in 2008?</p> <p>5 A. Maybe, yes.</p> <p>6 Q. Let me show you a document that's</p> <p>7 an e-mail between you and Jason Hong.</p> <p>8 A. Ah-hah.</p> <p>9 MR. TURNBULL: It is dated January</p> <p>10 18 of 2008. And I will ask that this be</p> <p>11 marked as Siu Exhibit 4.</p> <p>12 (Siu Exhibit 4, e-mail</p> <p>13 exchange between Chia Siu and Jason</p> <p>14 Hong marked for identification, as</p> <p>15 of this date.)</p> <p>16 Q. Ms. Siu, is this an e-mail</p> <p>17 exchange between you and Jason Hong?</p> <p>18 A. Yes.</p> <p>19 Q. And Jason is one of your</p> <p>20 roommates? No?</p> <p>21 A. No.</p> <p>22 Q. Who is Jason Hong?</p> <p>23 A. He's another person that works in</p> <p>24 public finance at another firm.</p> <p>25 Q. Which firm does he work at?</p>	86	<p>1 C. SIU</p> <p>2 Q. It says: "Hey, thanks, might need</p> <p>3 it since there is going to be another round of</p> <p>4 layoffs coming soon."</p> <p>5 A. Um-hum.</p> <p>6 Q. "Citi just laid off a bunch of</p> <p>7 people this week."</p> <p>8 Do you see that?</p> <p>9 A. Yes, I think that was around when</p> <p>10 Amy was let go.</p> <p>11 Q. So there were a round of layoffs</p> <p>12 in January of 2008, correct?</p> <p>13 A. Sorry. I just remembered there</p> <p>14 was another guy in our group at that time. I</p> <p>15 think he was a VP, Corey Hoeppner, he was let</p> <p>16 go along with Amy, I think.</p> <p>17 Q. In what round?</p> <p>18 A. I think the January round.</p> <p>19 MR. DATOO: When you say Amy, who</p> <p>20 are you referring to?</p> <p>21 THE WITNESS: Amy Wang, sorry.</p> <p>22 Q. And so there was a round in</p> <p>23 January of 2008, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And then you say there is another</p>	88



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June 12, 2012

<p>1 C. SIU</p> <p>2 carry out the communication to the group.</p> <p>3 Q. Do you recall attending a</p> <p>4 recruiting event in May of 2008?</p> <p>5 A. Yes. It's a disability corporate</p> <p>6 recruiting event.</p> <p>7 Q. Do you recall an event called Lime</p> <p>8 Corporate Recruiting?</p> <p>9 A. Yeah, it is a Lime Disability</p> <p>10 Corporate Recruitment event.</p> <p>11 Q. And you attended that event?</p> <p>12 A. Yes.</p> <p>13 Q. Why did you attend?</p> <p>14 A. It was a disability -- it is a</p> <p>15 recruiting event for people with disability.</p> <p>16 And I was concerned about my sibling, like,</p> <p>17 because my brother was about to graduate and I</p> <p>18 wanted to go and seek out information on his</p> <p>19 behalf to see what's out there for people with</p> <p>20 disability, if like some company have a</p> <p>21 disability program, it will be a great way for</p> <p>22 him to get in.</p> <p>23 Q. Do you recall applying for jobs</p> <p>24 for yourself after attending that event?</p> <p>25 A. I remember passing my resume along</p>	93	<p>1 C. SIU</p> <p>2 Q. Do you recall sending your resume</p> <p>3 to someone at Merrill Lynch?</p> <p>4 A. It could be. There were a few</p> <p>5 firms there.</p> <p>6 Q. Do you recall sending your resume</p> <p>7 to someone at Goldman Sachs?</p> <p>8 A. Yeah, there were a few firms,</p> <p>9 yeah. I've -- yeah, they asked for it.</p> <p>10 Q. And when you forwarded your resume</p> <p>11 to Merrill Lynch, you told them what positions</p> <p>12 you would be interested in.</p> <p>13 A. Yeah.</p> <p>14 Q. Is that right?</p> <p>15 A. They asked me what I'm interested</p> <p>16 in, if I'm looking to move or something.</p> <p>17 Q. And do you recall telling them</p> <p>18 that you were interested in investment</p> <p>19 management?</p> <p>20 A. Yeah, something, yeah.</p> <p>21 Q. And that would be a different job</p> <p>22 than what you were doing at Citigroup,</p> <p>23 correct?</p> <p>24 A. Yes, it's a different job.</p> <p>25 Q. And do you recall telling Merrill</p>	95
<p>1 C. SIU</p> <p>2 because, like, during my conversation with</p> <p>3 these recruiters, they also asked about me and</p> <p>4 my information and they thought it was nice of</p> <p>5 what I was doing for my sibling. So they were</p> <p>6 also curious about me. So as a courtesy, you</p> <p>7 know, I just offer my resume since they asked</p> <p>8 for it.</p> <p>9 Q. Well, you not only offered your</p> <p>10 resume; you told them what positions you would</p> <p>11 be interested in, correct?</p> <p>12 A. Yeah, yeah, like where I'm looking</p> <p>13 for.</p> <p>14 Q. So why were you looking for a</p> <p>15 position other than the position you had at</p> <p>16 Citigroup in May of 2008?</p> <p>17 A. I wasn't really looking for</p> <p>18 anything in particular, but I just, I thought</p> <p>19 it would be a good move to start networking</p> <p>20 because people told me to always network in</p> <p>21 case, like if you need a job you can always</p> <p>22 reach out to your network, if something</p> <p>23 happened to me, like in the future, I could</p> <p>24 reach out back to them. I just wanted to</p> <p>25 extend my network base.</p>	94	<p>1 C. SIU</p> <p>2 Lynch that you were open to any positions in</p> <p>3 finance that would be a suitable transition</p> <p>4 for you?</p> <p>5 A. Yes. I just wanted to keep my</p> <p>6 option open in case anything in the future, if</p> <p>7 anyone came for anything.</p> <p>8 Q. But in May of 2008 you said this</p> <p>9 is what I'm interested in, correct?</p> <p>10 A. Yeah. Yeah.</p> <p>11 Q. And you said you were open to any</p> <p>12 options?</p> <p>13 A. Yes. So in case I, if anything in</p> <p>14 the future happens to me, you know, I could</p> <p>15 reach back to them, and I don't want them to</p> <p>16 narrow their focus, like that's why I kept the</p> <p>17 option open.</p> <p>18 Q. And in May of 2008 CitiGroup had</p> <p>19 gone through two rounds of reductions at that</p> <p>20 point?</p> <p>21 A. Yeah, I wasn't sure if the March</p> <p>22 one counted -- was a mass reduction.</p> <p>23 Q. In May of 2008 were you concerned</p> <p>24 that there would be more reductions coming?</p> <p>25 A. Yeah, like the June one. Like</p>	96

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<p>1 C. SIU  2 they said there was going to be more after the  3 last one.  4 Q. After March?  5 A. Either March or like the beginning  6 of the year, yeah.  7 Q. So in May of 2008 you were  8 concerned that there would be more layoffs, is  9 that right?  10 A. Yes.  11 Q. And were you concerned that you  12 would be part of the layoffs?  13 A. I was a little concerned, but I  14 was pretty -- like, it wasn't a concern until  15 June, like.  16 Q. Do you recall in May when you sent  17 your resume to Merrill Lynch saying you were  18 interested in working for hedge funds?  19 A. I don't remember, but -- yeah.  20 Q. Is it possible that you said that?  21 A. It's possible.  22 Q. Were you interested in May of 2008  23 in working for hedge funds?  24 A. I was interested, but it was  25 unlikely that I would do that.</p>	97	<p>1 C. SIU  2 Q. So when you went to the Lime  3 event --  4 A. Yeah.  5 Q. -- you used Christie?  6 A. Yeah. And occasionally when we  7 hang out with friends, but people are just  8 used to calling me Chia, it's been so long.  9 Q. When did you start studying for  10 the CFA exam?  11 A. I believe it was like '07.  12 Q. And why did you decide to take the  13 CFA exam?  14 A. I thought it would make me a  15 better analyst and it would add something to  16 my resume to distinguish me from the rest of  17 the people in the department.  18 Q. Was that a requirement of your  19 job?  20 A. It wasn't a requirement, but it's  21 a very challenging exam. So people, like my  22 client has it so I felt like if I also get it  23 they will view me differently, someone who is  24 more knowledgeable in terms of providing  25 advice, like financial advice to them. And</p>	99
<p>1 C. SIU  2 Q. Why was it unlikely?  3 A. I have no, like, relevant  4 background.  5 Q. And do you recall telling someone  6 at Goldman Sachs of your interests as well?  7 A. Yeah, there was a few firms there.  8 Q. Again, you told Goldman Sachs that  9 you were interested in investment management?  10 A. Yes.  11 Q. And that you said that you are  12 open to any position in finance that would  13 help you make that transition?  14 A. Yeah. I didn't want to be narrow  15 to public finance if it was constricting.  16 Q. And by the way, do you use any  17 other name other than Chia?  18 A. Yeah. I think at that time, since  19 I was there on behalf of my brother, I didn't  20 want them to confuse my name, so I used  21 Christie sometimes at that time because I --  22 yeah, because sometimes when we're together it  23 would be confusing when people call Chi or  24 Chia because people have problem pronouncing  25 it. So I think it was better distinguishing.</p>	98	<p>1 C. SIU  2 one of my biggest client has it and that's  3 their name and I thought that, oh, I should  4 get it, especially if I want to differentiate  5 myself from like maybe High.  6 Q. So the CFA exam was not a  7 requirement of being an analyst at CitiGroup,  8 is that right?  9 A. Yeah, it was not a requirement but  10 it was something additional that I decided to  11 take the initiative. It like makes me a  12 better analyst so I can provide better advice  13 for my clients like in case. Because we were  14 a financial advisor to one client and they  15 needed like investment advice, like.  16 Q. Did you think having the CFA exam  17 would make you more marketable if you wanted a  18 job in investment management?  19 A. It will make me more -- well, it  20 doesn't hurt for sure. But I don't have any  21 direct experience. So it is like, it  22 doesn't -- it will be hard for me, to like  23 transfer if I wanted to.  24 I only got it to become a better  25 analyst and to add like credential to my</p>	100



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<p>1 C. SIU</p> <p>2 to 2007?</p> <p>3 A. Somehow I got the impression that</p> <p>4 it was doing better. Maybe someone mentioned</p> <p>5 it to me, but I can't remember.</p> <p>6 Q. Do you know what was happening in</p> <p>7 the housing market in 2008?</p> <p>8 A. Yes.</p> <p>9 Q. What was happening?</p> <p>10 A. It was constricting and -- but UBS</p> <p>11 was, stopped public finance, like they closed</p> <p>12 down their public finance shop. So there was</p> <p>13 a, like UBS was one of our biggest</p> <p>14 competitors. They have a lot of housing</p> <p>15 accounts. So it was a great opportunity for</p> <p>16 us to get those accounts during that time.</p> <p>17 Q. So one of your largest competitors</p> <p>18 shut down their housing group --</p> <p>19 A. Yes.</p> <p>20 Q. -- entirely?</p> <p>21 A. Yeah.</p> <p>22 Q. Why did they do that, do you know</p> <p>23 why?</p> <p>24 A. No, they closed down the public</p> <p>25 finance department.</p>	113	<p>1 C. SIU</p> <p>2 A. Yes, and the other person was</p> <p>3 Raymond High who also worked.</p> <p>4 Q. Mr. Chen, did he work on student</p> <p>5 loan deals?</p> <p>6 A. No.</p> <p>7 Q. And Mr. Fluehr worked on student</p> <p>8 loan deals, correct?</p> <p>9 A. Yes. Since he is the head of the</p> <p>10 group, he has to be involved.</p> <p>11 Q. Do you think that Mr. Chen was</p> <p>12 selected for layoff because of his gender?</p> <p>13 A. No.</p> <p>14 Q. Did you speak to him after his</p> <p>15 termination?</p> <p>16 A. Yes.</p> <p>17 Q. What did you and he discuss?</p> <p>18 A. He, I believe he left some stuff</p> <p>19 behind and he was curious, like who took over</p> <p>20 his accounts, like, the stuff that he was</p> <p>21 working on, like who continue.</p> <p>22 Q. Do you recall telling him that you</p> <p>23 needed a long break after he was laid off?</p> <p>24 A. No.</p> <p>25 Q. Do you recall telling him you were</p>	115
<p>1 C. SIU</p> <p>2 Q. The entire public finance</p> <p>3 department?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know why?</p> <p>6 A. I think according to the Newsday</p> <p>7 they want to focus -- given that it is not a</p> <p>8 US-based financial firm, they want to focus,</p> <p>9 like shift their focus elsewhere.</p> <p>10 Q. Do you recall when they exited the</p> <p>11 public finance business?</p> <p>12 A. I just remember it was like before</p> <p>13 the June layoff. It was around that time, the</p> <p>14 June 2008.</p> <p>15 Q. And what was happening to the</p> <p>16 student loan business in 2008?</p> <p>17 A. It was also constricting, but we</p> <p>18 were primarily a housing group so we did a lot</p> <p>19 of, mainly housing deals.</p> <p>20 Q. Except for Ms. Bartoletti also did</p> <p>21 student loans, correct?</p> <p>22 A. Yeah, additional. In addition to</p> <p>23 all her housing accounts.</p> <p>24 Q. And you worked on student loan</p> <p>25 deals, correct?</p>	114	<p>1 C. SIU</p> <p>2 jealous?</p> <p>3 A. Yeah, just to make him feel</p> <p>4 better, to make him feel like he's at a better</p> <p>5 position.</p> <p>6 Q. So you have said now that after</p> <p>7 the June 2008 RIF in which Mr. Fluehr and Mr.</p> <p>8 Chen were let go, that you were concerned</p> <p>9 about the future of the department, right?</p> <p>10 A. The housing group.</p> <p>11 Q. Right.</p> <p>12 A. Yes.</p> <p>13 Q. And did you talk to others about</p> <p>14 that?</p> <p>15 A. Yes. I talked to Ping about my</p> <p>16 job security and the future of the housing</p> <p>17 group, given what happened.</p> <p>18 Q. Were you concerned after that RIF</p> <p>19 about your job security?</p> <p>20 A. After the June 2008, yes, I was</p> <p>21 concerned because, like the head of the group</p> <p>22 was let go who has been there for about two</p> <p>23 decades.</p> <p>24 Q. Did you tell anyone in the group</p> <p>25 that you might quit?</p>	116



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CHIA SIU

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<p>1 C. SIU</p> <p>2 A. No. Like, I talked to Ping like</p> <p>3 about my concern and like to get her advice</p> <p>4 about, like what I should be doing, if I</p> <p>5 should be considering other option, because I</p> <p>6 was getting phone calls from recruiters and</p> <p>7 competitors, and I don't know if I should take</p> <p>8 it, but I really wanted to stay in the housing</p> <p>9 group and I really enjoy working with these</p> <p>10 people?</p> <p>11 So then -- but then if they were</p> <p>12 going to let me go, like, and if they were not</p> <p>13 committed to housing, like, I think for my</p> <p>14 future I need financial security, that I</p> <p>15 should just, like -- like I was seeking for</p> <p>16 advice, like what I should be doing. I was</p> <p>17 just mainly concerned about my job security.</p> <p>18 Q. And so you spoke to Ping about</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 Q. Did you speak to Ms. Bartoletti</p> <p>22 about that?</p> <p>23 A. Yes, I think she had, Ping had a</p> <p>24 conversation with Bartoletti and then</p> <p>25 Bartoletti had a conversation with me. But at</p>	117	<p>1 C. SIU</p> <p>2 A. They will try to work with</p> <p>3 management and see if they could get</p> <p>4 something, like a promotion.</p> <p>5 Q. Do you know whether Ms. Bartoletti</p> <p>6 was concerned that you would leave?</p> <p>7 A. I don't know if based on my</p> <p>8 conversation with Ping when I tell her about</p> <p>9 considering options given the situation of the</p> <p>10 group, if I should be turning down these calls</p> <p>11 from competitors like, and recruiters, like I</p> <p>12 don't know if that left her impression, but I</p> <p>13 told her that I would like -- like getting a</p> <p>14 promotion would give me a signal from</p> <p>15 management that they are committed to me and</p> <p>16 the group, like it's a sign.</p> <p>17 Q. Well, Ping was concerned you would</p> <p>18 leave, correct?</p> <p>19 MR. DATOO: Objection.</p> <p>20 Q. You can answer.</p> <p>21 MR. DATOO: You can answer.</p> <p>22 THE WITNESS: Oh.</p> <p>23 A. I don't know if it is based on my</p> <p>24 conversation. She thought that I, when I</p> <p>25 brought these, my situation up, when I told</p>	119
<p>1 C. SIU</p> <p>2 the end of my conversation with Ping, she</p> <p>3 suggested that if they could get, secure a</p> <p>4 promotion for me if that will make me feel</p> <p>5 better and secure about my position.</p> <p>6 I told her yes.</p> <p>7 Q. And when did Ping ask you about</p> <p>8 the promotion?</p> <p>9 A. It was during my first</p> <p>10 conversation with her after the layoff when I</p> <p>11 brought up about like the future of the</p> <p>12 housing group and my job security, and at the</p> <p>13 end of that conversation she asked me if</p> <p>14 getting me promoted would make me feel better</p> <p>15 and more secure about my job at Citigroup.</p> <p>16 Yeah. So then I told her, yeah,</p> <p>17 that would definitely make me feel secure,</p> <p>18 like.</p> <p>19 Q. Did you talk to Ms. Bartoletti</p> <p>20 about a possible promotion?</p> <p>21 A. Well, yes, so if she would -- I</p> <p>22 think Ping talked to Bartoletti and then</p> <p>23 Bartoletti followed up with me.</p> <p>24 Q. And what did Bartoletti say to you</p> <p>25 about a possible promotion?</p>	118	<p>1 C. SIU</p> <p>2 her that, oh, I have these other calls from</p> <p>3 competitors, you know, and recruiters, like, I</p> <p>4 don't know if I left her the impression that I</p> <p>5 might leave, but I told her that, like at the</p> <p>6 end she suggested that if she, if they could</p> <p>7 secure me a promotion, if I would feel better</p> <p>8 about my position at Citi and secure, like,</p> <p>9 that would alleviate it, my job security.</p> <p>10 Q. So did Ping raise the issue of a</p> <p>11 promotion for you as a way to get you to stay</p> <p>12 at the firm?</p> <p>13 MR. DATOO: Objection.</p> <p>14 A. I think she raised that to show</p> <p>15 that, like, if management agree, it will show</p> <p>16 a commitment that, to me that my job is secure</p> <p>17 and that, sending the signal that they are</p> <p>18 interested in keeping me around and the group</p> <p>19 around.</p> <p>20 Q. So part of it was to convince you</p> <p>21 not to leave, correct?</p> <p>22 MR. DATOO: Objection.</p> <p>23 Q. You can answer.</p> <p>24 MR. DATOO: You can answer.</p> <p>25 A. Yeah, to make me feel better about</p>	120



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CHIA SIU

June 12, 2012

<p>1 C. SIU  2 my security at Citigroup.  3 Q. And convince you not to leave?  4 A. Yes.  5 Q. And did you talk to Mr. Koessel  6 about a possible promotion?  7 A. Yes. He was also involved because  8 I think at that time he was a co-head after  9 Nick was let go.  10 Q. After Nick was let go, you  11 expected that they would be named co-heads, is  12 that right?  13 A. Excuse me?  14 Q. After Nick was let go, you  15 expected that Amy and Mike would be named  16 co-heads?  17 MR. DATOO: Objection. You can  18 answer.  19 A. It wasn't clear until I think a  20 few weeks after the layoff who was the head or  21 co-head of the group. It wasn't clear until,  22 like, probably a week or two weeks, because I  23 think management was still trying to figure  24 out. I believe they approached Amy first, but  25 then Koessel heard that and then he wanted it.</p>	<p>121</p> <p>1 C. SIU  2 identification, as of this date.)  3 Q. Ms. Siu, do you remember this  4 e-mail exchange between you and Mr. Chen?  5 A. Oh, this looks familiar.  6 Q. Is this one of the e-mails you  7 reviewed in preparing for the deposition?  8 A. Yes.  9 Q. I want to look at your e-mail on  10 the top, the July 9, e-mail.  11 A. Um-hum.  12 Q. Do you see at the bottom of your  13 e-mail you say: "I'm kind of jealous you are  14 not working now. I need a long break"?</p> <p>15 A. Yes.  16 Q. Did you feel like you needed a  17 long break in July of 2008?  18 A. Not a long break. Like maybe like  19 a day or two to recover from what went on.  20 Q. So when you said "I need a long  21 break" to Mr. Chen, that wasn't being honest  22 with him?  23 A. No, I mean, it could be. I'm not  24 sure how people view a long break is, but to  25 me it could be like two, three days, you know,</p>
<p>1 C. SIU  2 too, so.  3 Q. But when Nick was let go, what was  4 your expectation as to who would be head of  5 the group?  6 A. I would have expected Amy to be  7 the head of the group given that she was at  8 the firm much longer, like a decade longer  9 than Koessel and she has more experience.  10 Q. Do you recall telling others that  11 you expected that Koessel and Bartoletti would  12 be named co-heads?  13 A. I don't remember, but that could  14 be the alternative, if not Amy, then it will  15 be both Amy and Koessel.  16 Yeah, I'm not sure how they  17 decide.  18 MR. TURNBULL: I want to show you  19 a document that's an e-mail exchange  20 between you and Henry Chen in July of  21 2008. And I will ask that this be  22 marked as Siu Exhibit 7.  23 (Siu Exhibit 7, e-mail  24 exchange between Chia Siu and Henry  25 Chen in July of 2008 marked for</p>	<p>122</p> <p>1 C. SIU  2 but I don't know if people....  3 Q. So is it your testimony that when  4 you said in this e-mail "I need a long break,"  5 you were thinking about two or three days?  6 A. Yeah, I just needed time to, like,  7 recover, like absorb what went on after the  8 June layoff. Like to recollect -- I mean  9 to --  10 Q. So, again, by saying a long break  11 it is your testimony you meant just a couple  12 of days?  13 A. Yes.  14 Q. If you go up above in this e-mail  15 in the third sentence to Mr. Chen, you say:  16 "I have a feeling that both Mike  17 and Amy will be co-head of the group."  18 Do you see that?  19 A. Yes.  20 Q. And why did you believe that?  21 A. Well, right after the layoff at  22 the end of June, I would think Amy will be  23 automatically co-head, but it's been like so  24 long and we don't know who is a co-head is so  25 I felt like maybe there is some discussion</p>

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1 C. SIU 2 Q. Had Mr. Koessel been dishonest you 3 with in the past? 4 A. No. 5 Q. And then you continue in your 6 e-mail to Henry Chen: 7 "Less temptation for me if it 8 doesn't happen." 9 Do you see that? 10 A. Ah-hah. 11 MR. DATOO: You have to say yes or 12 no. 13 A. Yes. 14 Q. Are you referring to less 15 temptation for you to stay if you don't get 16 promoted? 17 A. Less temptation, yeah, because I 18 was getting calls from recruiters and other 19 competitors, and if they offer me associate, 20 then that would be a better option for me to 21 go to if Citi doesn't want me around, if they 22 are not committed to me or the housing group. 23 Q. So by July of 2008 you were 24 already thinking of leaving, correct? 25 A. Well, I was concerned about my job	129	1 C. SIU 2 about the commitment to housing. It talks 3 about your promotion, right? 4 A. Yeah, and myself. 5 Q. And it says: "I doubt I will get 6 promoted this year." 7 A. Um-hum. 8 Q. And then you say "Less temptation 9 for me if it doesn't happen." 10 A. Um-hum. 11 Q. And you are referring to the 12 promotion, correct? 13 A. Yes. 14 Q. And if you don't get promoted, you 15 will be less tempted to stay? 16 A. Um-hum. 17 Q. Right? 18 A. Yeah, if I get another offer. 19 Q. And you were looking for other 20 jobs at that time, right? 21 A. I was getting calls from banks and 22 recruiters. 23 Q. And you were considering other 24 options at that point, right? 25 A. Yes, because I didn't have a	131
1 C. SIU 2 security still, because my initial offer was a 3 two-year term from '07 to end of July -- I 4 mean, June of '08, and I didn't receive my 5 offer yet. 6 So I was concerned that, like, all 7 of a sudden one day they will just tell me to 8 pack up because they didn't give me an offer 9 to stay. Because normally it will happen 10 before July 2008 if they -- yeah. 11 Q. And so if they -- 12 A. So if I was -- 13 Q. I'm sorry, are you finished? 14 A. Sorry, yeah. 15 Q. So if they didn't offer you a 16 promotion, you wouldn't be tempted to stay at 17 Citigroup, that's what you were telling Mr. 18 Chen, correct? 19 MR. DATOO: Objection. 20 You can answer. 21 A. Yes. If like if another firm 22 offer me a better position and if Citi wasn't 23 committed to housing, because they let Nick 24 go. 25 Q. Your e-mail, though, doesn't talk	130	1 C. SIU 2 third-year offer so I wasn't sure if my job 3 was on the line. 4 Q. You did receive an offer to stay, 5 correct? 6 A. Yeah, it wasn't until like towards 7 the end or middle of July when I already 8 became a third-year. 9 Q. And who gave you that offer to 10 stay for a third year? 11 A. I forgot who hand it to me 12 directly, but probably someone from HR. 13 Q. Do you recall that in June of 2008 14 it wasn't just that you were getting offers, 15 but you were actually affirmatively sending 16 out your resume seeking other jobs? 17 A. Yeah, I think it was around that, 18 the end of that layoff. 19 Q. After -- 20 A. Yeah, because it was so close to 21 July 1st, like I don't know if July 1st I have 22 to pack up and leave because that was the time 23 of the original letter. 24 Q. And so you recall applying to -- 25 well, let me just show you a series of	132

CHIA SIU

June 12, 2012

<p>1 C. SIU  2 documents.  3 MR. TURNBULL: Let me have this  4 marked as Siu Exhibit 8. It is an  5 e-mail from you to eFinancial Careers.  6 (Siu Exhibit 8, e-mail from  7 Chia Siu to eFinancial Careers  8 marked for identification, as of  9 this date.)  10 Q. Do you recall applying for this  11 job?  12 A. Yeah, I probably just sent my  13 resume. I just randomly click on it without  14 really thinking, because it was right after, I  15 believe right after the layoff, and July 1st  16 was approaching and I was concerned about --  17 like, I wasn't sure if they were going to ask  18 me to pack up on July 1st.  19 Q. Let me ask you about that. After  20 the layoffs you spoke to Ping, correct?  21 A. Yeah, that was like end of July.  22 Q. You spoke to Ping at the end of  23 July?  24 A. Yeah.  25 Q. Do you recall speaking with Marty</p>	133	<p>1 C. SIU  2 was concerned that like if they were on the  3 same page as the head of my group, like why I  4 got a small bonus in the prior year.  5 Q. And you testified about that  6 earlier, right?  7 A. Yeah.  8 Q. And he told you it is because of  9 the --  10 A. The market.  11 Q. The market?  12 A. Or even though -- yeah. Or the  13 firm.  14 Q. Did Mr. Feinstein say that your  15 contract's up at the end of the month and you  16 have to leave, during this meeting?  17 MR. DATOO: Objection.  18 You can answer.  19 A. We didn't talk about that.  20 Q. In fact, you talked about what was  21 going to happen going forward, right?  22 A. We mainly talk about the group,  23 like why, like the outcome of the reduction,  24 why it occurred because it didn't make sense  25 for me.</p>	135
<p>1 C. SIU  2 Feinstein in June?  3 A. After the layoff?  4 Q. Yes.  5 A. Yeah, yeah. Yes. I think so,  6 yes.  7 Q. And you expressed your concerns to  8 Mr. Feinstein, correct?  9 A. Yeah, like, I think I was  10 concerned about why they let like two people  11 in my group go, because it didn't make sense  12 to me when we were short-staffed. It was  13 confusing.  14 Q. And what did Mr. Feinstein say to  15 you in this meeting?  16 A. I don't really remember, but it  17 was for cost-savings purposes.  18 Q. That that's why the layoffs had  19 occurred?  20 A. Yeah.  21 Q. Did you talk to Mr. Feinstein  22 about your position and whether you were going  23 to have to leave at the end of the month?  24 A. I didn't bring that up, but I did  25 talk about like why my bonus was lower. So I</p>	134	<p>1 C. SIU  2 Q. And do you recall when this  3 conversation with Mr. Feinstein occurred?  4 A. I think, I know it happened, it  5 happened after the layoff in June, but I, June  6 or maybe beginning of July. I don't remember.  7 Because I mean it was, the layoff was end of  8 June, so it is sort of like July.  9 Q. And so you were speaking with him  10 at a time when your contract was either  11 expired or about to expire?  12 A. Yeah.  13 Q. And he never told you that he  14 expected you to leave, did he?  15 A. No. We were just talking about  16 the reasoning behind the layoff.  17 Q. And you also spoke to Mike Koessel  18 around this time, correct?  19 A. Yeah, I think it was around end of  20 June or July. I don't know.  21 MR. TURNBULL: Let me show you an  22 e-mail dated June 27. Wait. This might  23 not be it.  24 Q. I'm sorry, you said you recall  25 speaking to Mr. Koessel about your concerns?</p>	136



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<p>1 C. SIU</p> <p>2 A. It might be after Ping. I forgot.</p> <p>3 It was like, everything happened so fast like</p> <p>4 in June, July.</p> <p>5 Q. Do you recall speaking to Mr.</p> <p>6 Koessel on the same day you spoke to Mr.</p> <p>7 Feinstein about your concerns?</p> <p>8 A. I -- I don't remember.</p> <p>9 Q. Did you tell Mr. Koessel -- you do</p> <p>10 recall meeting with him, you just can't recall</p> <p>11 the date, right?</p> <p>12 A. Yeah, when.</p> <p>13 Q. So putting the date aside, do you</p> <p>14 recall telling him you were concerned about</p> <p>15 the future of the group?</p> <p>16 A. Yeah.</p> <p>17 Q. And do you recall telling him you</p> <p>18 were concerned about your own future?</p> <p>19 A. I might have mentioned it. I</p> <p>20 don't remember if I talked to him.</p> <p>21 Q. Do you know whether Mr. Koessel</p> <p>22 was concerned that you might leave?</p> <p>23 MR. DATOO: Objection.</p> <p>24 A. I wasn't sure what he was</p> <p>25 thinking.</p>	<p>1 C. SIU</p> <p>2 the reasoning of the layoffs?</p> <p>3 A. I believe it's due to cost-saving.</p> <p>4 Q. That's what you recall Mr.</p> <p>5 Brownstein saying?</p> <p>6 A. Yeah. Purpose.</p> <p>7 Q. Do you recall him saying anything</p> <p>8 else about the layoffs?</p> <p>9 A. Maybe that it wasn't necessary for</p> <p>10 Nick to be around to, for the group to</p> <p>11 continue since, like, Amy and Koessel have the</p> <p>12 ability to run the group.</p> <p>13 Q. Anything else that you recall him</p> <p>14 saying about the layoffs?</p> <p>15 A. No, not -- you know, I can't</p> <p>16 recall.</p> <p>17 Q. And then you also said that you</p> <p>18 spoke to him about the future of the group?</p> <p>19 A. Yes.</p> <p>20 Q. And what did Mr. Brownstein say</p> <p>21 about that?</p> <p>22 A. He tried to reassure me that they</p> <p>23 are committed to the group, but then -- yeah,</p> <p>24 but I didn't understand why Henry was let go</p> <p>25 since they replaced him with a less qualified</p>
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